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June 6, 2025

The Honorable Eleanor G. Tennyson
Magistrate Judge
J. Caleb Boggs Federal Building
844 N. King Street
Unit 38
Room 4104
Wilmington, DE 19801-3555

Re: In re *Ex Parte* Application of Petronas Azerbaijan (Shah Deniz) S.à.r.l
and Petronas South Caucasus S.à.r.l; Case No. 24-1283 (CFC) (EGT)

Dear Magistrate Tennyson:

I write on behalf of Respondent CF Taurus (US) LLC and in response to Your Honor's Oral Order, dated June 4, 2025, (D.I. 35). Prior to filing Respondent's Motion for Leave to File a Sur-Reply Brief, (D.I. 30) (the "Motion"), the parties conferred only via e-mail, a copy of which is attached as Exhibit A.

Given Petitioners' unequivocal response that they would oppose the Motion, the undersigned counsel construed the response to mean that Petitioners did not intend to further meet and confer regarding the Motion and determined that further discussions regarding the Motion would be futile. *See, e.g., St. Clair Intellectual Prop. Consultants v. Palm, Inc.*, 2009 U.S. Dist. LEXIS 49922, at *6 (D. Del. June

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10, 2009) (finding e-mail communications sufficient under Local Rule 7.1.1 where the communications indicate further discussions regarding non-dispositive motion would be futile).

Counsel regrets that the certification in the Motion did not reflect the nature of the parties' meet and confer efforts in advance of filing the Motion or counsel's determination that further efforts to meet and confer would be futile.

Respondent respectfully submits that the Court should not dismiss the Motion on procedural grounds because it would prejudice Respondent as the Motion is meritorious. *See id.* at *6-7 (granting non-dispositive motion where parties corresponded only via e-mail prior to filing motion).

Respectfully submitted,

/s/ Jennifer L. Cree

Jennifer L. Cree (No. 5919)

JLC/lmr

cc: All counsel of record (*via* ECF)